

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA, EASTERN DIVISION**

**JEFFREY ALAN FLORREICH,** )  
 )  
 **Plaintiff,** )  
 )  
 **v.** )  
 )  
 **VICTORIA LYNNE MEISTER,** )  
 )  
 **Defendant.** )

**CIVIL ACTION NO.  
3:06cv442-MHT**

**PETITION TO REMAND**

**COMES NOW**, the Plaintiff, Jeffrey Alan Florreich, by and through his attorneys of record, Pritchard, McCall & Jones, LLC and moves the Court to enter an Order pursuant to 28 U.S.C.A §1447(c) to remand this action to the Circuit Court of Tallapoosa County, Alabama and for grounds therefor would submit the following:

1. The Plaintiff does not seek any award in excess of Seventy Five Thousand Dollars (\$75,000.00).
2. The Plaintiff has not requested any relief over and above the amount of Seventy Five Thousand Dollars (\$75,000.00), thereby removing this action from the jurisdiction of this Court as defined in 28 U.S.C.A §1332.
3. The Plaintiff will, upon remand to the Circuit Court of Tallapoosa County, Alabama promptly file an amendment to his Complaint setting out a specific monetary demand of Seventy Five Thousand Dollars (\$75,000.00).

**WHEREFORE**, the Plaintiff moves this Court to enter an Order remanding this action to the Circuit Court of Tallapoosa County, Alabama.

/s/ Michael L. McKerley ( MCK027 )  
Attorney for Plaintiff

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**OF COUNSEL:**

Pritchard, McCall & Jones, LLC  
800 Financial Center  
505 North 20<sup>th</sup> Street  
Birmingham, Alabama 35203  
205.328.9190

**CERTIFICATE OF SERVICE**

\_\_\_\_\_ I hereby certify that a copy of the foregoing pleading has been served upon the following counsel by placing a copy of the same in the United States Mail, postage prepaid and properly addressed on this the 13<sup>th</sup> day of June, 2006.

Alex L. Holtsford, Jr.  
Susand Dehghani-Sanich  
Nix, Holtsford, Gilliland, Higgins & Hitson, P.C.  
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\_\_\_\_\_/s/Michael L. McKerley  
Of Counsel  
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